

# **APPENDIX C**

**APPENDIX C:** Selected Quotations from Dr. Shamos' Invalidity Report that cite to admitted trial exhibits and support claim elements that ePlus says are not supported (*see* Appendix 2 to ePlus' Motion (Dkt. 526-2)).

Claim Element	Claim Language	Admitted Exhibits Relied on by Dr. Shamos for P.O. Writer
<b>'683 Patent</b>		
3(b)	means for selecting the product catalogs to search;	<p><b>From Shamos Report (Ex. F) at ¶182:</b></p> <p>"The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .)." L0126576-77 (DX-117)</p>
3(c)	means for searching for matching items among the selected product catalogs;	<p><b>From Shamos Report (Ex. F) at ¶182:</b></p> <p>"The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .)." L0126576-77 (DX-117)</p> <p><b>From Shamos Claim Chart (Ex. J) (Cell J102 at p. 23):</b></p> <p>"P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528)." (DX-141).</p>
28(c) and 29(c)	searching for matching items among the selected product catalogs;	<p><b>From Shamos Report (Ex. F) at ¶182:</b></p> <p>"The P.O. Writer Plus system allowed a user to select product catalogs to search, resulting in a search of less than the entire data set in the database. The system allowed a user to search for matching items among selected product catalogs by specifying various search criteria including item number, commodity code, and keyword associated to the item description. (The P.O. Writer Manual, Guided Tour at 46-47. . .)." L0126576-77 (DX-117)</p> <p><b>From Shamos Claim Chart (Ex. J) (Cell J151 at p. 33):</b></p> <p>"P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528)." (DX-141)</p> <p><b>From Shamos Claim Chart (Ex. J) (Cell K138 at p. 30) (relating to the identical element in claim 26, element 26(c)):</b></p> <p>"P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525." (DX-141).</p>